1 JODI LINKER Federal Public Defender 2 Northern District of California JOYCE LEAVITT 3 Assistant Federal Public Defender 13th Floor Federal Building - Suite 1350N 4 1301 Clay Street Oakland, CA 94612 5 Telephone: (510) 637-3500 Cellular telephone: (415) 517-4879 Email: Joyce Leavitt@fd.org 7 8 Counsel for Defendant PARRISH 9 10 IN THE UNITED STATES DISTRICT COURT 11 FOR THE NORTHERN DISTRICT OF CALIFORNIA 12 **OAKLAND DIVISION** 13 14 UNITED STATES OF AMERICA, Case No.: CR 4:23-MJ-70297 MAG 15 Plaintiff. STIPULATION AND [PROPOSED] ORDER TO CONTINUE STATUS 16 v. CONFERENCE, EXCLUDE TIME, AND EXTEND DEADLINES UNDER THE 17 IAN PARRISH. SPEEDY TRIAL ACT AND FED R. CRIM. P. 5.1 TO AUGUST 23, 2023 18 Defendant. 19 20 21 22 IT IS HEREBY STIPULATED, by and between the parties to this action that the status hearing 23 for defendant Ian Parrish scheduled for August 22, 2023, before the duty magistrate judge, be 24 continued one day to Wednesday, August 23, 2023, at 10:30 a.m. before the duty magistrate for 25 arraignment on information. The reason for the continuance is as follows: The parties are very close 26 to negotiating a resolution which will result in the waiver of indictment and arraignment on an 27 information but need one additional day to finalize the proposed plea agreement before the

STIP & [PROPOSED] ORDER RE: STATUS TO 8/23/23 PARRISH, CR 4:23–MJ-70297 MAG

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information will be filed. The continuance is sought under the Speedy Trial Act. The parties agree

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1 and stipulate that the time until August 23, 2023, should be excluded, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), for effective preparation of counsel because the ends of justice served by 2 the granting of the continuance outweigh the best interests of the public and defendant in a speedy 3 4 and public trial for the reasons described above. 5 The parties further stipulate that, with the consent of the defendant, there is good cause for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1 and 6 for extending the 30-day time period for an indictment under the Speedy Trial Act for the reasons 7 discussed above. See Fed. R. Crim. P. 5.1; 18 U.S.C. § 3161(b). 8 9 IT IS SO STIPULATED. 10 11 Dated: August 21, 2023 12 JODI LINKER 13 Federal Public Defender Northern District of California 14 15 /S/ JOYCE LEAVITT 16 Assistant Federal Public Defender 17 Dated: August 21, 2023 18 ISMAIL J. RAMSEY 19 United States Attorney Northern District of California 20 21 /S/ EVAN M. MATEER 22 Assistant United States Attorney 23 24 25 26 27 28

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION

UNITED STATES OF AMERICA.

Plaintiff,

V.

IAN PARRISH.

Defendant.

Case No.: CR 4:23-MJ-70297 MAG

[PROPOSED] ORDER TO CONTINUE STATUS CONFERENCE, EXCLUDE TIME, AND EXTEND DEADLINES UNDER THE SPEEDY TRIAL ACT AND FED R. CRIM. P. 5.1 TO AUGUST 23, 2023

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the status hearing for defendant Ian Parrish, currently scheduled for August 22, 2023, at 10:30 a.m., is continued to August 23, 2023, at 10:30 a.m., before the duty magistrate for arraignment on information and waiver of indictment.

IT IS FURTHER ORDERED that the time until August 23, 2023, is hereby excluded from the Speedy Trial Act, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), for effective preparation taking into account due diligence as described in the stipulation. The Court finds that the ends of justice served by the granting a continuance outweigh the best interests of the public and defendant in a speedy and public trial. The Court finds good cause for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1 and extending the 30-day time period for an indictment under the Speedy Trial Act for the reasons discussed above. *See* Fed. R. Crim. P. 5.1; 18 U.S.C. § 3161(b).

IT IS SO ORDERED.

Dated:

HON. DONNA M. RYU

Chief United States Magistrate Judge